

DATE REQUESTED	DOCUMENT REQUESTED	No. of Req.	OUTSTANDING DOCUMENTS
1/6/21	Production of Documents Request	#1	<ul style="list-style-type: none"> Def. have not produced any of its publicly released social media posts on Facebook, twitter, and any other social media outlets that it uses of the City of Wauwatosa, Dennis McBride, and the Wauwatosa Police Department as it relates to the curfew, proclamation of emergency.
		#2	<ul style="list-style-type: none"> Def. have not provided communications from the time period of 5/25/20 – 6/30/2020 & 12/13/20 – 4/16/21 in Def. possession that include the following search terms : curfew, emergency declaration, emergency order, state of emergency, proclamation of emergency, TPR, The People’s Revolution Def. have not provided communications from the time period of 5/25/20 – 4/16/21 in Def. possession that include the following search terms: Alvin Cole, David Beth, John Martin Antaramian, John Chisholm, Governor Evers, and Daniel Miskinis
		#5	<ul style="list-style-type: none"> Def. have not provided all police reports, memorandums, arrest information, arrests data, booking information, any and all videos such as drone videos, squad videos, body cameras, video created by mobile phones, and audio recordings etc. for those who were surveilled, questioned, detained, ticketed, or arrested of all affiliated police departments who the WPD requested assistance of, such as the FBI, the U.S. Marshalls, the National Guard, in connection to the curfew imposed from October 7, 2020 – October 12, 2020. In particular, Def. have not provided interrogation footage from other sources that may be in their possession <p>* Some of the assisting agencies that WPD have various videos responsive to this request but have failed to provide include info from Bayside, Fond du Lac County, Glendale PD, Greendale PD, Waukesha Co., Waukesha PD, Winnebago Co.</p>
		#7	<ul style="list-style-type: none"> It is unclear if the Def. have not provided all responsive documents, electronic communications audio, emails, text messages, from July 1, 2020 to December 31, 2020 between the Defendants and members of the Wauwatosa Police and Fire

			<p>Commission in relation to protesting, the people's revolution, curfews, and police presence in the City of Wauwatosa between August 13, 2020 – October 14, 2020. Of note, def. have not provided any text messages that may be relevant to this request.</p> <ul style="list-style-type: none"> It is unclear if Def. have provided all documents, electronic communications audio, emails, text messages, from July 1, 2020 to December 31, 2020 between the Defendants and members of the Common Council in relation to protesting, the people's revolution, curfews, and police presence in the City of Wauwatosa between August 13, 2020 – October 14, 2020.
6/26/21	Plaintiff's 1 st Req. & Interrogatories	Inter. #1	Plaintiff's do not have all the names, job titles, email address, phone numbers, badge numbers, or ID's of all the people who had access to or received the TPR Target/Protestor List from 6/1/20 – 6/24/21.
		Inter. #2	Plaintiff's do not have all the companies, governmental entities, non-governmental agencies, law enforcement agencies, of persons who had access or received the TPR Target/Protestor List from 6/1/20 – 6/24/21
		Inter. #3	<ul style="list-style-type: none"> Plaintiffs do not have <u>any</u> social media handles and/or emails created by the City of Wauwatosa employees or WPD on Facebook, twitter, Instagram, reddit, viper, and any other social media sites used to surveil and/or engage with any persons on the TPR Target list It is unclear if Plaintiffs have received all social media handles and emails used by the City of Wauwatosa employees or WPD such as on Facebook, twitter, Instagram, reddit, viper, and any other social media sites used to survey and/or engage with any persons on the Protestor list – to date Plaintiffs have received Confidential Informant (CI) info from persons working with the WPD but only for Facebook social media and no other social media CI social media handles
3/29/21	Deposition of Barry Weber	#1-3	General deposition standard: Any and all documents to which you may refer in your deposition and/or testimony in any hearing in this matter; Any and all copies of any written correspondence upon which you rely to support your claims and professional assessment, evaluation and/or conclusions; Any and all documents you intend to introduce or rely upon

			at trial in this case. (No documents directly related to Weber were produced at this deposition)
7/26/21	Dominick Ratkowski Depo Notice	#2	It is unclear if defendants provided all documents including social media, social media handles, recordings (including but not limited to FBI live, Instagram live, etc.) copies in relation to any emergency situations in Wauwatosa; and also any credible and serious threats of violence and vandalism, including but not limited to the burning down of Mayfair Mall, concerns of outside agitators that were received, viewed, or created by you and/or any of the agents of the city, including WPD officers and any/all agents participating and/or coordinating, collaborating, at the behest of the Defendant City from May 25, 2020 – present.
		#3	Defendants have not provided Any and all social media handles created on behalf of the WPD used to monitor any persons from May 25, 2020 through the present. <i>(Similar to above 6/26/21 Interrogatory #3)</i>
		#10	Defendants have not provided all metadata of emails as well as any attachments to emails that were sent to, emails sent from, or emails received at the email address of dratkowski@wauwatosa.net and text messages sent to or from 414-688-0079 <i>(no text messages received to date)</i> from the dates of May 25, 2020 through present regarding the following : <ul style="list-style-type: none"> - protesting in the City of Wauwatosa from June 1, 2020 through present - law enforcement operations in regards to the October 7 – 12, 2020 curfew in Wauwatosa - any and all emails that mention or refer to the following persons and search terms : Kathryn Knowlton, Kimberley Motley, Deja Vishny, Alvin Cole, Tracy Cole, Taleavia Cole, David Bowen, John Larry, Mary Lockwood, Khalil Coleman, Jacqueline Bogenberger, Kyle Rittenhouse, Gaige Grosskreutz, Antifa, the People's Revolution, TPR, BLM, Kenosha, George Floyd, Jacob Blake, curfew tickets, Barry Weber.
7/26/21	Joseph Roy Depo Notice	Req. #4	Defendant's have not provided all metadata of emails , attachments to emails, text correspondence, communications to or from any federal agencies, local agencies, persons, which refer to or are about the Protestor List or the Protestor folder. <i>This would include media outlets.</i>

		Req. #5	It is unclear if defendants have provided all <u>metadata of emails</u> , attachments to emails, text correspondence, communications to or from any federal agencies or agents including but not limited to persons from the FBI, U.S. Attorney's Office, U.S. Marshals, CIA, the Department of Homeland Security, the FAA, (ICE Immigration and Customs Enforcement), the state or federal National Guard which you sent, received, or have in your possession that refer or are about protesting and or about curfews from May 25, 2020 to present.
		Req. #6	It is unclear if defendants have provided all metadata of emails, attachments to emails, text correspondence, communications to or from any local law enforcement agencies which you sent, received, or have in your possession that refer or are about protesting and or about curfews from May 25, 2020 to present.
		Req. #7	It is unclear if defendants have provided aall metadata of emails, attachments to emails, text correspondence, communications to or from Dominick Ratkowski, Barry Weber, any Wauwatosa Police Officers, James Archambo, Dennis McBride, any Wauwatosa Common Council Members, members of the PFC, any federal agencies, any local law enforcement agencies, any private business entities, and local and federal governmental entities, which you sent, received, or have in your possession that refer or are about protesting and/or about curfews from May 25, 2020 to present.
7/27/21	James Archambo Depo Notice	#3	Def. have not produced James Archambo's most recent employment contract per 2.08.090 and job description which includes duties, responsibilities, expectations, rubric for evaluation (blank); and any/all other conditions of employment;
		#4	Def. have not produced any contracts/agreements/MOUs between both the City and/or the WPD with Brookfield Property Retail Group and/or Brookfield Asset Management, its representatives, agents, assigns;
		#5	Def. have not produced any contracts/agreements/MOUs between both the City and/or the WPD with CVMIC, its representatives, agents, assigns;
		#6	Def. have not produced any contracts/agreements/MOUs between both the City and/or the WPD which support the

			Wauwatosa Intelligence Systems Information, including all applicable policies, equipment lists, personnel contacts, trainings, impacted technology (Cellebrite, etc.);	
		#7	Def. have not produced any contracts/agreements/MOUs between both the City and/or the WPD with state and federal Department of Transportation, state and federal Department of Motor Vehicles, FBI, Homeland Security, US Marshalls, CIA and/or US Attorney's Office;	
		#8	Def. have not produced any and all communication between the City and/or the WPD with the FAA of requests, responses, directives, policies, citations regarding drone operation in and/or by Wauwatosa from June 1, 2020 through December 1, 2020;	
		#9	Def. have not produced any and all communication and contact information, and including formal and informal communication/agreement, whether or not reduced to writing, of all contracts/agreements/MOUs (written or oral) between both the City and/or the WPD with any non-government entities, including volunteers, private businesses, non-profits, etc. regardless of formal organized corporation status between June 1, 2020 and December 1, 2020; Def. have specifically not produced Contract between the City of Wauwatosa and Attorney George Schimmel between 6/1/20 – 12/1/20	
7/29/21	Luke Vetter Depo Notice	#2	Def. have not produced all documents including social media copies in relation to any emergency situations in Wauwatosa; and also any credible and/or serious threats of violence and vandalism, including but not limited to the burning down of Mayfair Mall, concerns of outside agitators that were received, viewed, or created by any Defendants and/or agents/employees of the Defendants from May 25, 2020 – October 14, 2020.	
		#3	Def. have not produced all metadata of emails, attachments to emails, text correspondence, communications to or from any federal agencies, local agencies, persons, which refer to or are about the TPR Target/Protestor List or the Protestor folder.	

		#6	Def. have not produced Meta data of any and all documents pertaining to WPD file numbers 20-12965, 20-13276, 20-13093 (Taleavia Cole),
		#7	<ul style="list-style-type: none"> Def. have not produced Metadata of email and/or letter to David Clarke about protesting in Wauwatosa Nov. 2020 from Luke Vetter – Def. gave a pdf document in BATES 17088
		#8	<p>Def. has have not produced in relation to Vetter all metadata of emails as well as any attachments to emails that were sent to, emails sent from, or emails received at the email addresses of : WUPDCP@wauwatosa.net ; lvetter@wauwatosa.net, and any other emails that you used regarding the below from the dates of May 25, 2020 through present regarding the following :</p> <ul style="list-style-type: none"> - protesting in the City of Wauwatosa from June 1, 2020 through present - law enforcement operations in regards to the October 7 – 12, 2020 curfew in Wauwatosa - any and all emails that mention or refer to the following persons and search terms : Kathryn Knowlton, Kimberley Motley, Deja Vishny, Alvin Cole, Tracy Cole, Taleavia Cole, David Bowen, John Larry, Mary Lockwood, Khalil Coleman, Jacqueline Bogenberger, Kyle Rittenhouse, Gaige Grosskreutz, Antifa, the People's Revolution, TPR, BLM, Kenosha, George Floyd, Jacob Blake, curfew tickets, Barry Weber.
		#9	It is unclear if Def. have produced all reports, notes, emails, messages in any form which refer to or about any forms of force used by any law enforcement against anyone from May 25, 2020 through October 13, 2020.
08/19/21	Martin Keck Depo Notice	#3	It is unclear if defendant's have produced any and all metadata of emails, attachments to emails, text correspondence, communications to or from any federal agencies, local agencies, persons, which refer to or are about the Protestor List or the Protestor folder from May 25, 2020 through the present.
		#6	Defendant have not produced any social media handles created and/or social media handles used to monitor, target, and/or surveil anyone on the TPR Target/Protestor List from May 25, 2020 through present.

		#7	It is unclear if defendants have produced all metadata of emails, attachments to emails, text correspondence, communications to or from any federal agencies or agents including but not limited to persons from the FBI, U.S. Attorney's Office, U.S. Marshals, CIA, the Department of Homeland Security, (ICE Immigration and Customs Enforcement), the state or federal National Guard which you sent, received, or have in your possession that refer or are about protesting and or about curfews from May 25, 2020 to present.
		#8	It is unclear if defendants have produced all metadata of emails, attachments to emails, text correspondence, communications to or from any local law enforcement agencies which you sent, received, or have in your possession that refer or are about protesting and/or about curfews from May 25, 2020 to present.
		#10	Def. have not produced all metadata of emails, emails, as well as any attachments to emails that were sent to, emails sent from, or emails received from May 25, 2020 through present regarding the following : - protesting in the City of Wauwatosa from June 1, 2020 through present - law enforcement operations in regards to the October 7 – 12, 2020 curfew in Wauwatosa - any and all emails that mention or refer to the following persons and search terms : Kathryn Knowlton, Kimberley Motley, Deja Vishny, Alvin Cole, Tracy Cole, Taleavia Cole, David Bowen, John Larry, Mary Lockwood, Khalil Coleman, Jacqueline Bogenberger, Kyle Rittenhouse, Gaige Grosskreutz, Antifa, the People's Revolution, TPR, BLM, Kenosha Guard, Proud Boys, terrorist, right wing extremist, domestic terrorist, Robin Vining, and Trump.
08/20/21	Shane Wrucke Depo Notice (<i>identical as to Keck above, and also missing:)</i>	#2	Defendant's have not produced all documents including social media copies in relation to any emergency situations in Wauwatosa ; and also any credible and/or serious threats of violence and vandalism, including but not limited to the burning down of Mayfair Mall, concerns of outside agitators that were received, viewed, or created by any Defendants and/or agents/employees of the Defendants from May 25, 2020 – October 14, 2020.

		#11	<p>It is unclear if defendant's have produced all copies of any written correspondence upon which you rely to support your claims and professional assessment, evaluation and/or conclusions, and including warrants, applications, and/or probable cause for phone/electronic device searches;</p> <ul style="list-style-type: none"> Defendant did not produce the 2 search warrant applications for Taleavia Cole's phone as testified to by Wrucke in his deposition
09/16/21	Production of Documents Request	#1	<p>Please provide any and all written memoranda, reports, correspondence, documents, photographs, diagrams, videos whether it be by body camera, vehicle/dashcam video, telephone video, recorded statements and any other writings pertaining to protesting in the city of Wauwatosa from May 25, 2020 through present which are in any of the named Defendant's or their designees possession, custody and/or control at any time.</p>
		#2	<p>Any and all metadata of emails in native form, attachments to emails, text correspondence, communications to or from any federal agencies, local agencies, persons, private entities, NGO's, or any persons or entities which refer to, have attached as a document, or are about the "TPR Target List," including by any other name, and/or the Protestor Folder as created by Defendant Dominick Ratkowski in any configuration from May 25, 2020 through the present.</p>
		#3	<p>Please produce any and all metadata of emails in native form as well as any attachments to emails that were sent to, emails sent from, or emails received at the email addresses of : mcleeacovid@googlegroups.com from the dates of May 25, 2020 through present that are in the possession of any of the Defendants or their designees.</p>
		#4	<p>Please produce any and all metadata of emails in native form as well as any attachments to emails that mention or refer to the following persons and search terms : Kimberley Motley, Deja Vishny, Kathryn Knowlton, Milo Schwab, Tracy Cole, Taleavia Cole, John Larry, Khalil Coleman, Jacqueline Bogenberger, Mariah Smith, Gaige Grosskreutz, Joey Koepp, Breon Foster, Sean Kafer, Antifa, the People's Revolution, TPR, and BLM that are</p>

			in the Defendant's possession or their designees from May 25, 2020 through present.
		#5	<p>Please Produce any and all emails from May 25, 2020 through present from the emails of tcourt@wauwatosa.net, erondeau@wauwatosa.net, rbloczynski@wauwatosa.net, GSchimmel@Schimmel-Law.com, bweber@wauwatosa.net, jfarina@wauwatosa.net, and lvetter@wauwatosa.net that refer to and or mention whether explicitly or implicitly the following people and search terms: Tracy Cole, Taleavia Cole, Tahudah Cole, Tristiana Walls, Andrew Aaron, Kamila Ahmed, Robert Agnew, Isiah Baldwin, Jacqueline Bogenberger, Lavita Booker, Rebecca Burrell, Raine Cich, Khalil Coleman, Steven Conklin, Lauryn Cross, Rachel Dulay, Anne Delessio-Parson, Erik Fanning, Jessica Fenner, Jill Ferguson, Breon Foster, Joanna Geisler, Christine Groppi, Gaige Grosskreutz, Joseph Hayes, Percy Hayes, Destiney Jones, Adante Jordan, Mary Kachelski, Sean Kafer, Joey Koepp, John Larry, Alex Larson, Sonora Larson, Holly Lavora, Lazarito Matheu, Vaun Mayes, Molly Nilssen, Shawn Page, Carmen Palmer, (juvenile) Palmer 1, (juvenile) Palmer 2, Leah Porter, Aidali Rivera, William Rivera, Hector Rodriguez, Jose Hernandez Ramirez, Oscar Concepcion Rodriguez, Rosalind Rogers, Nathan Sabel, William Schroeder, Madeliene Schweitzer, Mariah Smith, Peter Sparks,</p> <p>Tiffany Stark, Angel Vega, Christina Vitolo-Haddad, Gabriella Vitucci, Oscar Walton, Jayden Welch, Britta Welch, Suzanne Wells, Brandon Wilborn, Trisha Wilson, KatelynWojnar, Sonja Worthy, and members of TPR which are in any of the named Defendant's Possession or their designees from May 25, 2020 through present.</p>
		#7	Please produce the contract, terms of reference, employment personnel file and/or employment file of George Schimmel and/or Schimmel Law Offices that he or his entity has with the City of Wauwatosa during the entirety of this contractual relationship with the City of Wauwatosa.